# IN THE UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF PENNSYLVANIA

ECL GROUP, LLC d/b/a EYE CARE § LEADERS and ELI RESEARCH INDIA **§ § § § § §** PRIVATE LIMITED, Plaintiffs, CIVIL ACTION NO. 2:22-ev-00057 v. § SOURABH MOHARIL, ABHAY HONORABLE MAUREEN P. KELLY § JAISWAL, AGILITE GLOBAL United States Magistrate Judge SOLUTIONS COMPANY, LLC, and **§** § § § MANAGED MARKETS INSIGHT AND TECHNOLOGY, LLC, Defendants.

### JOINT MOTION TO EXTEND TIME TO COMPLETE ADR

Counsel for the parties respectfully and jointly move this Court to extend the time to complete mediation, and aver and allege in support as follows:

- 1. Pursuant to the Court's Order dated April 26, 2022, the parties were ordered to file the Stipulation Selecting ADR Process no later than April 19, 2022. ECF 38, p. 2.
- 2. The parties filed a Stipulation Selecting ADR Process on April 19, 2022, in which they agreed to conduct mediation but could not agree on a date by which to complete mediation. ECF 43, §§ I, III.
- 3. During the Initial Case Management Conference, this Court ordered the parties to file both (1) an Amended ADR Stipulation identifying the mediator and selecting a date for mediation to be held, which must be on or before August 24, 2022; and (2) this Motion to Extend Time Period to Complete ADR until September 1, 2022. ECF 45, ¶¶ 6-7; see ECF 46, ¶ 4 (setting June 26, 2022, as the original date by which to complete ADR).
  - 4. This Court ordered both filings to be made by Friday, May 6, 2022. ECF 45, ¶¶

6-7.

WHEREFORE, the parties respectfully and jointly request that this Court extend the time period to complete ADR until September 1, 2022. A proposed Order is attached hereto.

Date: May 6, 2022 Respectfully submitted,

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